

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, WESTERN DIVISION

In Re:) Case No: 17-81682
Edward Murphy)
Barbara L Murphy) Chapter: Chapter 13
Debtors)
) Judge: Thomas M. Lynch

NOTICE OF MOTION

To: Edward and Barbara Murphy, 11850 Blue Bayou Drive, Huntley, IL 60142
Lydia Meyer, 308 W. State St., #212, Box 14127, Rockford, IL 61105-4127
Office of the U.S. Trustee, 780 Regent St., Ste. 304, Madison, WI 53715

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

PLEASE TAKE NOTICE that on **February 15, 2018 at 9:00 a.m.** I shall appear before the Honorable Judge **Thomas M. Lynch** at 327 South Church St., Courtroom 3100, Rockford, IL 61101 and then and there present the attached **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached hereto.

By: /s/ Kristin K Beilke
Kristin K Beilke

CERTIFICATE OF SERVICE

I, Kristin K Beilke, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 1/25/2018.

By: /s/Kristin K Beilke
Kristin K Beilke

Attorneys for the Debtors

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960

Adams Collision Center C/O Certified Services INC 1300 N Skokie Hwy Ste 10 Gurnee IL 60031	Centegra Attn: Bankruptcy Department PO Box 6203 Carol Stream IL 60197	FNBM C/O LVNV Funding LLC PO Box 10584 Greenville SC 29603
Asset Acceptance LLC Bankruptcy Department PO Box 2036 Warren MI 48090	Harris & Harris, LTD Bankruptcy Dept. 111 W Jackson Blvd Suite 400 Chicago IL 60604	Resurgent Capital Services Bankruptcy Dept. PO Box 10587 Greenville SC 29603-0587
McHenry County Clerk 11AR952 2200 N. Seminary Ave. Woodstock IL 60098	Centegra Health Attn: Bankruptcy Department PO Box 6204 Carol Stream IL 60197	H & R Accounts INC Attn: Bankruptcy Dept. 5320 22Nd Ave Moline IL 61265
Freedman Anselmo Lindberg & Bankruptcy Dept. PO Box 3216 Naperville IL 60566	Centegra Primary Care C/O Harris & Harris, LTD 111 W Jackson Blvd Suite 400 Chicago IL 60604	Kohls/Capone Attn: Bankruptcy Dept. N56 W 17000 Ridgewood Dr Menomonee Falls WI 53051
BK OF AMER Attn: Bankruptcy Dept. 4909 Savarese Cir Tampa FL 33634	Center for Diagnostic Imaging Bankruptcy Dept PO Box 1450 Minneapolis MN 55485	Lucille Dooley 350 Newgate Court Schaumburg IL 60193
Capital One Bankruptcy Department PO Box 30285 Salt Lake City UT 84130	Chase Bank Bankruptcy Department PO Box 15298 Wilmington DE 19850	McHenry Radiologist Bankruptcy Dept PO Box 220 Mc Henry IL 60051
Capital One Bankruptcy Department PO Box 30285 Salt Lake City UT 84130	COMENITY BANK/Lnbryant Attn: Bankruptcy Dept. Po Box 182789 Columbus OH 43218	Mercy Health System Attn: Bankruptcy Department PO Box 5003 Janesville WI 53547
Becket & Lee Bankruptcy Dept. PO Box 3001 Malvern PA 19355	Comenity-Game Stop Bankruptcy Dept PO Box 659820 San Antonio TX 78265	Millie Murphy 28 Regent Circle Schaumburg IL 60193
Carsons/Comenity Bank Bankruptcy Department PO Box 182789 Columbus OH 43218	Corporate America Family C.U. Bankruptcy Department 2075 Big Timber Rd. Chicago IL 60123	MiraMed Revenue Group Bankruptcy Department 360 E 22nd St Lombard IL 60148
Centegra C/O H & R Accounts 4950 38th Ave. Moline IL 61265	Corporate America FCU Attn: Bankruptcy Dept. 2075 Big Timber Rd Elgin IL 60123	Mohela/DEPT OF ED Attn: Bankruptcy Dept. 633 Spirit Dr Chesterfield MO 63005
Centegra Attn: Bankruptcy Department PO Box 187 Bedford Park IL 60499	Credit One Bank Bankruptcy Department PO Box 60500 City Of Industry CA 91716	Onemain Attn: Bankruptcy Dept. Po Box 1010 Evansville IN 47706
	FED LOAN SERV Attn: Bankruptcy Dept. Po Box 60610 Harrisburg PA 17106	Onemain Attn: Bankruptcy Dept. Po Box 499 Hanover MD 21076

Rise Credit
Bankruptcy Dept
PO Box 10808
Fort Worth TX 76185

Select Portfolio Svcin
Attn: Bankruptcy Dept.
Po Box 65250
Salt Lake City UT 84165

Spoton Loan
Bankruptcy Dept.
PO Box 6243
Logan UT 84341

SYNCB/Napa Easy Pay
Bankruptcy Dept
PO Box 965036
Orlando FL 32896

Cavalry Portfolio SPV I
Bankruptcy Dept.
PO Box 1030
Hawthorne NY 10532

Synchrony BANK
C/O Cavalry Portfolio SERV
Po Box 27288
Tempe AZ 85285

Synchrony/Care Care
Bankruptcy Dept.
PO Box 960061
Orlando FL 32896

Verizon Wireless
Attn: Bankruptcy Dept.
Po Box 650051
Dallas TX 75265

Woodman S - Carpentersville #3
C/O Payliance
3 Easton Oval Ste 210
Columbus OH 43219

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MOTION TO MODIFY CONFIRMED PLAN

NOW COME the Debtors, Mr. & Mrs. Edward Murphy (the "Debtors"), by and through their attorneys, Geraci Law L.L.C., to present their **MOTION TO MODIFY CONFIRMED PLAN**, and state as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b)(2).
2. The Debtors filed their Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Code on 07/19/2017.
3. The Debtors' plan was confirmed by the Court on 10/20/2017.
4. During the plan, the Debtors cars require substantial repairs. The total of the repairs will be \$1,194.11.
5. Debtors cannot pay for these repairs and the trustee payment.
6. It is necessary for the successful completion of the Debtors' plan to suspend Debtors' plan for 3 months, so they can afford the car repairs.
7. The timely filed claims are lower than scheduled, and the plan will pay out at 100% with the suspension.

Honorable Court enter an order:

1. Suspending Debtors' current Chapter 13 plan for 3 months; and
2. Any other relief this Court deems just and proper.

By: /s/ Kristin K Beilke
Kristin K Beilke

Attorneys for the Debtors

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960